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Israel

Biotechnology

Annual Agricultural Biotechnology Report

2005

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U.S. Embassy, Cairo

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Report Highlights:
Currently, there is no commercial production of biotechnology crops in Israel. This situation is not expected to change in the next few years. The Israeli food committee will publish the procedures for food registration in the immediate future, however labeling of modified food products will not be required. Registration will be required for food products containing GMO ingredients derived from soybean, corn, canola and chicory.

Includes PSD Changes: No
Includes Trade Matrix: No
Annual Report
Tel Aviv [IS1]
[IS]

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Section I. Executive Summary

Currently, there is no local commercial production of biotechnology crops in Israel. This situation is not expected to change in the next few years. Field experiments of genetically engineered plants began ten years ago and are continuing. Experiments have been conducted on tomatoes, potatoes, eucalyptus, flowers, soybean, cotton, corn, strawberries and bananas.

The Israeli food committee is drafting procedures for food registration. As it stands, there will be no requirements for the labeling of modified food products. Due to health care issues, the food committee will begin the registration of food products containing GMO ingredients from soybean, corn, canola and chicory.

Section II. Biotechnology Trade and Production

Currently, there is no local production of biotechnology crops in Israel. This situation is not expected to change in the next few years.
The local food industry, however does use biotech raw materials for the purpose of food production, mainly corn and soybean that are imported from the U.S. and Argentina. Food products imported from the EU containing more than 1 percent of biotech components have GMO labeling, however U.S. food products which contain GMO components are not labeled.

It is likely that a fraction of the Israeli food products exported to the U.S. contain biotech ingredients. Exports of Israeli food products to the EU, which contain more than one percent of biotech components, must be labeled.
In CY 2004, approximately 70 percent (390 tmt) of the total soybean imports to Israel were GMO, and of the total corn imports to Israel, approximately 40-50 percent (480-600) were GMO.

Food Aid
Israel is not a food aid recipient and is unlikely to be a recipient in the future.

Section III. Biotechnology Policy

Israel's Regulatory Framework

Two committees are responsible for the biotechnology regulatory framework in Israel: The Governmental New Foods Committee of the Ministry of Health and the Ministry of Agriculture and The National Committee for Transgenic Plants (NCPT) of the Ministry of Health and the Ministry of Agriculture. The labeling of food products and the registration of food ingredients, which contain biotech components, are the responsibility of the food committee. The testing of biotechnology crops and the regulations on genetically modified organism plants are the responsibility of the NCPT committee.

The committee has suggested new regulations governing GMO products in two areas:
1) the registration process of GMO foods; and
2) the labeling process

Since the legislative process is expected to take approximately two years, the food committee will publish the procedures for food registration for the time being. The new procedures will not be concerned with the labeling of modified food products.

Under the premise of protecting public health, the food committee will begin registration of food products containing GMO ingredients derived from the following crops: soybean, corn, canola and chicory.
Imported food products will be divided into two groups – food products existing in the food market and new food products. The procedures for the two groups will be as follows:

1. Existing food products – the importer must provide information of the legal regulations for the specific product in industrial countries (U.S., EU, Switzerland, Norway, Japan, Australia, and Canada). The information must include the approved purpose of the food product and description of any genetically engineered procedures in the manufacture of the product.
2. For new food products which are not yet registered the importer must submit a registration application accompanied by the following required certification: Toxicology

test, safety assessment, results of previous clinical experiments, commercial name of the product and nature of the biotech modifications.

Testing for Biotechnology Crops

Field experiments of genetically engineered plants began in Israel ten years ago. To date, experiments have been conducted on tomatoes (increasing lycopene level), potatoes, eucalyptus, flowers, soybean, cotton, corn, strawberry and banana. Experiments are conducted at Israeli universities, field experiments and greenhouses. The Monsanto Company, a U.S. company, financed a number of experiments.

In CY 2004 planted area for experimental crops totaled 2.6 hectares. It is prohibited to conduct field experiments for biotechnology crops near seed fields, organic or commercial fields. In order to conduct an experiment an application must be submitted to the Plant Protection and Inspection Services of Israel (PPIS), (see annex 1). Genetically modified organisms are the responsibility of the Ministry of Agriculture and the Ministry of Health. The PPIS is the competent authority in Israel concerning genetically modified crops. New regulations on genetically modified plants were issued in June 2005.

Table 1: Field Experiments for Genetically Engineered Plants Conducted in Israel, CY 2004

Name of Institute	Project Title	Size of Experimental Plot	Site of Experiment
Dept. of Genetics, ARO, Volcani Center	Fruit set under temperature stress in tomato	0.1 ha	Negev
CBD Technologies Ltd.	Increased growth rate in potato	0.02 ha	Negev
CBD Technologies Ltd.	Increased growth rate in eucalyptus	1 ha	Central
Field & Garden Crops, ARO, Volcani Center	Starch synthesis reduction in strawberry leaves	0.05 ha	Central
Rahan Meristem (1998) Ltd.	Banana plants with improved fruit shelf life	0.3 ha	Western Galilee
RH Smith Inst. Of Plant Sciences & Genetics in Agriculture	Glyphosate based weed management practices in roundup	0.3 ha	Coastal plain
Faculty of Agricultural Food & Environmental Sciences, Hebrew University	Ready cotton		
RH Smith Inst. Of Plant Sciences & Genetics in Agriculture, Faculty of Agricultural Food & Environmental Sciences, Hebrew University	Efficacy of purple nutsedge (Cyperus rotundus) control using crop rotations	0.5 ha	Upper Galilee
RH Smith Inst. Of Plant Sciences & Genetics in Agriculture, Faculty of Agricultural Food & Environmental Sciences, Hebrew University	Glyphosate based weed management practices in roundup ready corn	0.3 ha	Coastal plain

Labeling

Currently, labeling requirements do not apply to modified food products and crops in Israel; however, periodically EU importers from Israel require certification that Israeli crops are non-GMO. In these cases the director of the PPIS or the chairperson of the NCTP provides the necessary certification.
Recently a new governmental food committee approved a plan to prepare regulations covering the labeling of GMO products. The regulation must first be approved by the Attorney General of the Health Ministry and must then be approved by the Economic Committee of the Israeli Parliament and finally signed by the Ministers of Industry and Trade and Minister of Health of Israel. All in all it is unlikely that the approval will be in the near future. Regulations will require that food containing more than one percent of GMO components will be labeled, similar to EU regulations.

Biosafety Protocol

Israel did not sign the Cartagena Protocol on Biosafety and is unlikely to do so at present.

Section IV. Marketing Issues

Currently the Israeli consumer is unaware of the biotechnology food issue or the GMO content in food products. Even when GMO labeling requirements are in effect, the GMO issue will not change the Israeli consumers' approach to buying, as only 0.35 percent of the total local food market value are organic food products. The Israeli organic food market is valued at $50 million annually including exports. Eighty percent ($40 millon) of the local organic production is for export.

Section V. Reference Materials

Annex 1: Application for permit to experiment with transgenic plants, GMO and their import

Ministry of Agriculture /משרד החקלאות
ועדה ראשית לצמחים מהונדסים (ורצ"מ)
National Committee for Transgenic Plants(NCTP)

בקשה לרישוי ניסויים בצמחים מהונדסים (צ"מ) * ויבואם

Application for permit to experiment with transgenic plants, GMO ** & their import

(המידע בבקשה ישמש לרישוי ניסויים בלבד, בצ"מ, מ"א וייבוא עבורם.
לשחרור לסביבה ולמסחור נדרש מידע ואישור נוספים לבקשה מתאימה נפרדת).

(This information will be used to determine eligibility to receive permit only for experiments with genetically modified plants & microorganisms and their import. For release to environment and commercialization permit, additional information is required in a separate form)

הועדות המטפלות בבקשה זו רשאיות לספק מידע בלתי מסווג המופיע בבקשה ו/או הנלווה אליה לכל חוקר או גורם מוסמך שיבקש זאת ממנה. חוקר המעונין שמידע מסוים המופיע בבקשה ו/או הנלווה אליה יסווג ולא יופץ יציין זאת בעת הגשת הבקשה והועדות המטפלות בה תתייחסנה לכך.

Any information that the applicant does not want to disclose for competitive reasons can be claimed as confidential information. Applicants should submit a written justification to support each claim, which will be considered.

הוראות: יש למלא את כל הפרטים הנדרשים, בעברית ובאנגלית, ולצרף מידע נוסף לפי הרשימה.

Instructions: Complete this form and enclose the supporting information listed.

Experiment details: No. (למילוי ע"י ורצ"מ) מס' פרטי הניסוי:

Date_____ תאריך

_____ מטרת הניסוי:

Aim of experiment:_____

Type of permit requested סוג האישור המבוקש

Renewal חידוש New חדש

For experiments לניסויים ברמת מעבדה/חממה/שדה (כולל ייבוא)*** ◆
In the lab. / Greenhouse/ field (including import)***

For import לייבוא

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* ומיקרואורגניזמים (מ"א) הקשורים אליהם
GMO= Genetically Modified Organisms **
* **מחק את המיותר

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ורצ"מ - השירותים להגנת הצומח ולבקרת ת.ד 78 בית-דגן 50250

The applicant **פרטי המבקש**

Name _____ שם:

Title_____ תואר:

Address **כתובת המוסד/המחלקה**

_____

_____

Telephone/fax _____ טלפון/פקס:

E-mail _____ דואר אלקטרוני

Application details **פרטי הבקשה**

שם מדעי: _____ שם מקובל ו/או מסחרי _____

שם הזן: _____

Common or Trade name: _____ scientific name _____

Description of the genetic material **תאור החומר הגנטי**

פרט: מקור הגנים המוחדרים, מקבל הגנים, דרך העברה (הוקטור), אתר ההחדרה (גרעין/חוץ גרעין) ופרטי התוצר *(יש לצרף מפה)* להלן:

_____

Designation of transformed line:
Phenotype:
Construct; Genotype (promoter; gene; enhancer; terminator) (Please add map):

Selectable marker (promoter; gene; terminator):

Origin of the regulated article _____ * המקור לקבלת החומר לניסוי/יבוא

_____

_____

* מחק את המיותר

אמצעי הכליאה. פרט כאן וציין מראה מקום (*מפה*) בתכנית המחקר המצורפת
Containment - means: Refer to research proposal or specify here.
מיקום מתקן הניסוי, סימון, נעילה, בידוד, ביוב, אמצעי חירום,; נוהל בטיחות
Location of the experiment facility (map), marking, isolation, confinement, sanitation; biosafety procedure

_____
_____
_____
_____

ניטור – פרט וציין את שיטות הנטור המולקולריות והפנוטיפיות המוצעות על ידך לנטור במהלך הניסוי ולאחריו
Monitoring - specify the means you will use to follow gene transfer, phenotypic & genetic stability, during and after the field trial

_____
_____
_____

הערות (ביצוע ניסויים דומים בחו"ל) Comments (similar experiment abroad)

_____
_____
_____

קטגוריית האשור המבוקש **Permit class definition**

(מיועד למבקשים פטור לניסוי ויבוא חומר צמחי מהונדס או מ"א הקשורים אליו)

פטור / לא פטור * *** exempt / not exempt**

* מחק את המיותר

נימוקים (לבקשות לפטור בלבד) _____
_____
_____

(* For exempt only)
State why you believe this case comes within the requested exempt definition.

משך האשור המבוקש ***Duration of Permit required***

נימוקים (לא חל על שינוי בתנאי הניסוי) _____
_____
_____

התחייבות

1. הנני מאשר בזאת שכל המידע בבקשה זאת ובנספחיה הוא למיטב ידיעתי והכרתי מלא, נכון ומדויק.
2. הנני מתחייב לנהוג בעת פעילותי עם צמחים ומ"א מהונדסים לפי כל ההוראות והכללים של נוהל בטיחות מוסדית, ורצ"מ ותנאי הרישוי.
3. הנני מתחייב להודיע לוב"מ על מועד תחילת ותום הניסוי והצעדים שננקטו לשם סיומו והשמדת החומר הביולוגי.

4. הנני מצהיר בזאת שהערכת הסיכון המובאת בבקשה זאת ובנספחיה נערכה לפי מיטב ידיעתי ומקורות המידע שעמדו לרשותי והנני מתחייב להעביר לורצ"מ כל מידע חדש שיגיע לידי בנושא. הנני מתחייב לנהוג בעת פעילותי לפי הנחיות ורצ"מ שינבעו מהערכת הסיכון של הניסוי המבוקש.

Commitment

a. I hereby certify that the information in this application and all attachments is complete and accurate to the best of my knowledge and belief.

b. I hereby certify that during the conduct of the experiment I will follow the institutional bio-safety committee & the national committee procedures and the license conditions.

c. I hereby certify to report to the institutional bio-safety committee about the initiation & termination of the experiment and the measures taken for termination & disposal of the biological material.

d. I hereby declare that the risk assessment submitted in this application and its attachments was prepared to the best of my knowledge and information sources available. I hereby certify to report to the NCTP of relevant new information and to follow the NCTP procedures required according to the risk assessment submitted.

חתימה: _____ תאריך: _____

Date: _____ Signature: _____.

Enclosures **נספחים**

א. שמות וכתובות ו/או מספקי חומרי הניסוי ( ) *

a. Names and addresses of the persons who developed and/or supplied the regulated ( ) *

ב. תכנית המחקר המפורטת (כולל פרטי מתקן הניסוי, ביולוגיה מולקולרית של מרכיבי המערכת, ביטויים והשוני בהשוואה לפנוטיפ המקובל ( ) *.

b. A detailed research plan including description of the research facility, the molecular biology of the system components, their expression and how that differs from that in the parental organism ( )*.

ג. כל מידע הקשור לנושאי התפשטות והשפעות של מרכיבי הניסוי על הסביבה והאמצעים בקשר לכך ( ) *.

c. Relevant information regarding and impact of the system components and the appropriate safeguard measures which will be taken for regulated article ( ) *.

ד. נוהל חירום ( ) * d. Emergency procedure

ה. נוהל תום ניסוי ( ) * e. Experiment termination procedure

ו. מידע לניסוי שדה: שטח, מיקום, תיאור, - שיטות ניטור ובקרה, סעיפים ד' ה' כנ"ל ( ) *.

f. Information regarding field trail & release to the environment Area, Location, description of the Control & monitoring measures d & e as above ( ) *.

* מצורף (ציין ב-X) * enclosed (X)

Annex 2: Seed Regulations (Genetically Modified Plants and Organisms) - 2005

According to my authority under paragraphs 3 and 4 of the Seeds Law 5716 - 1956[i] (hereafter The Seeds Law), and under paragraphs 2 and 3 of The Plant Protection Law, 5716-1956[ii] (hereafter The Plant Protection Law), following consultation with the Advisory Committee according to paragraph 2 of The Seeds Law and paragraph 9 of The Plant Protection Law, with the authorization of the Minister of Finance according to paragraph 39-b of the Law of the Foundations of the Budget 5745-1985[iii] with the authorization of the Knesset Finance Committee according to paragraph 7(b) of Basic Law: The State Economy[iv], and with the authorization of the Knesset Economics Committee according to paragraph 21 a (a) of Basic Law: The Knesset[v], and paragraph 2(b) of the Penal Code, 5737-1977[vi], I hereby publish the following regulations:

Definitions

1. In these regulations:

"A Genetically Modified Organism" – an organism, including micro-organism, virus, viroid, and any other unicellular or multicellular entity that has undergone change by means of genetic engineering, and that is related to plants in any way throughout its life cycle;

"The Director" – the director of the Plant Protection and Inspection Services (PPIS) in the Ministry of Agriculture and Rural Development (hereafter – the Ministry) or whomever he has authorized for the purposes of all or some of these regulations;

"Genetically modified propagation material" – A genetically engineered plant and any part thereof that is used for propagation and cultivation;

"Sale" – including presentation for sale, advertising, possession and transfer, even without remuneration, excepting possession or transfer for purposes of experimentation;

"Containment facility" – A greenhouse in which experiments are conducted;

"Experiment" – A genetic engineering experiment on plants or organisms

"A genetically modified plant" – A plant that has undergone change by means of genetic engineering;

"Field" – A plot in which an experiment is being conducted;

"Registration Certificate" – According to its meaning in Regulation 11.

Main Committee on Genetic Modification.

2. (a) The Minister of Agriculture and Rural Development will appoint a Main Committee on Genetic Modification (hereafter MCGM) for the purpose of conducting experiments on and the sale of genetically modified plants and organisms. It will be comprised of the following thirteen members:

1. Two representatives of the Ministry, of whom one will serve as committee chairman and the second, his alternate;
2. A representative from a list furnished by the Minister of the Environment;
3. A representative from a list furnished by the Minister of Health;
4. A representative from a list furnished by the Minister of Science and Technology;

5. Eight representatives of the public from among scientists and researchers having an interest in the natural sciences, preservation of nature and the environment, as well as from among seed producers and plant and varietal breeders.

(b) The role of the MCGM is to advise The Director on the basis of these Regulations and to determine whether the conduct of experiments with genetically modified plants or organisms, or the sale thereof may represent a danger to humans or to animals or have unreasonable negative effects on the environment.
(c) The MCGM will determine its own workinging procedures and deliberation formats.

3. (a) No persons will conduct an experiment with a genetically modified plant or organism unless they possess written permission from The Director and act according to the conditions of the permit (hereafter the Experiment Permit)**.**
(b) The Director is authorized to issue a permit to conduct an experiment and to set conditions and limitations at his own discretion, including conditions for the destruction of plants, organisms and accompanying items used in the experiment, as well as tests to be conducted in the approved laboratory, all on condition that he does not issue a permit for an experiment to be conducted in –

1. a physical containment facility, unless it has been proven to him that the structure suits its purpose and that the applicant has taken all the measures necessary to prevent danger to humans, to animals or plants or to prevent unreasonable effects on the environment;
2. a field, except after consultation with the MCGM.

(C) In spite of anything stated in sub regulation (a), The Director may exempt an applicant from obtaining a permit to conduct an experiment, provided the experiment is conducted in a laboratory and he is convinced that:

1. The laboratory is equipped with an autoclave as defined in the Work Safety Ordinance (new version) 5730-1970[vii];
2. The laboratory occupant and its Safety Officer will undertake to destroy on a regular basis all remnants of the experiment in the autoclave or will sterilize these remnants with disinfectants that he has authorized.

Request for an Experiment Permit

4. (a) An application for an Experiment Permit or for an exemption therefrom (hereafter an application for an Experiment Permit) will be submitted on a form as instructed by The Director and the applicant will fill out all the particulars on it accurately and in detail.
(b) To an application for an Experiment Permit, the applicant will attach an experiment plan and, with respect to an imported genetically modified plant or organism, also an import permit according to the Plant Protection Regulations (Plant Imports), 5731-1970[viii].
(c) The Director is authorized at any time to request additional details about the experiment for which the permit had been

requested.

Application fee Experiment Permit

5. Upon submission of an application for a permit to conduct an experiment to be carried out in one of the locations noted below, the following fee will be paid:

1. In a containment facility - 184 new sheqalim
2. In a field – 368 new sheqalim
3. In a laboratory - 296 new sheqalim

The Director's announcement of a request for an Experiment Permit

6. (a) Within 90 days of the date on which an application was submitted for an Experiment Permit, including all the required documents according to Regulation 4(b), and the application fee was paid according to Regulation 5, The Director will send the applicant notice of his decision regarding the Experiment Permit; if The Director refused permission to conduct the experiment, he will explain the reasons for his refusal.

(b) If The Director decides to permit the conduct of an experiment, the following Experiment Permit fee will be paid:

1. In a containment facility – the sum of 407 new sheqalim
2. In a field – the sum of 296 new sheqalim plus 41 new sheqalim per dunam or portion thereof.

Sale and export

7. (a) No person shall sell a genetically modified plant unless The Director authorized it after consulting the MCGM and all the conditions and the limitations of the Experiment Permit have been complied with.

(b) A person shall not sell genetically modified propagation material or organisms that do not have a valid Registration Certificate or the authorized label attached to them.

(c) No person shall export a genetically modified plant or organism except after having received a permit in writing from The Director and according to its conditions.

Request for registration

8. (a) A person wishing to sell a genetically modified plant or a genetically modified organism will submit to The Director an application for registration according to the form indicated by The Director (hereafter Application for Registration) and will complete it accurately and in detail.

(b) An applicant will attach to his application all of the following:

1. Description and characterization of the genetic modification and complete data on effects and potential effects on humans, animals, plants and the environment;
2. Professional literature on the results of experiments conducted on the modified propagation material or organism and ways it has been used in other countries, including the labels employed in countries in which it is authorized, all accompanied by translations into Hebrew (excluding English);
3. Report on the results of experiments on the genetically modified propagation material or the modified organism under Israeli conditions, as well as the means by which it is intended to be used;
4. A proposed label for the modified propagation material as set out in the regulations under the Seeds Law (with the addition "genetically modified material");
5. With respect to genetically modified organisms – proposed packaging and labels, on condition that the words "genetically modified material" are indicated on the label;

6. In the case of imported genetically modified propagation material or imported genetically modified organisms – also attach the import permit;
7. Additional details at the request of The Director, including test results from a laboratory he has authorized.

(c) Upon submission of an Application for Registration an application fee of 552 new sheqalim will be paid.

Refusal to register

9. (a) The Director may refuse to register for sale genetically modified propagation material or organisms if the applicant failed to submit sufficient proof, to the satisfaction of The Director, that the modified propagation material or organisms do not endanger plants.

(b) The Director will refuse to register genetically modified propagation material or genetically modified organisms if the MCGM has determined that the said material endangers humans or animals or has unreasonable negative effects on the environment.

The date of The Director's decision as to the Application for Registration

10. The Director will send the applicant notice of his decision as to the Application for Registration within 120 days of submission of the application with all the accompanying documentation as set out in Regulation 8(b) and provided the application fee set out in Regulation 8(c) has been paid. If The Director refuses to register the genetically modified propagation material or genetically modified organism for sale, he will explain his reasons for the refusal.

11.(a) The Director is authorized to grant the applicant a Registration Certificate after having examined the Application for Registration and the attached documents according to Regulation 8(b) and after having onferred with the MCGM.

(b) The Registration Certificate will contain the permit number of the permit issued by the Plant Protection and Inspection Service in the Ministry and the text of the label approved by The Director.

(c) The Registration Certificate is valid for three years from the date indicated therein and The Director can set limiting conditions as he sees fit.

Registration fee

12. Following The Director's decision to register propagation material or a genetically modified organism, a registration fee of 6,392 new sheqalim will be paid.

Renewal of a Registration Certificate

13. (a) A holder of a Registration Certificate who wishes to renew it will apply to The Director on a form indicated by him not later than one month prior to the expiration of the Registration Certificate.

(b) Upon renewal of the Registration Certificate as stated in sub paragraph A (above), a registration renewal fee of 460 new sheqalim will be paid.

(c) A holder of an expired Registration Certificate, who did not submit an application for renewal according to sub regulation (a) above and who wishes to continue to sell the propagation material or the genetically modified organism, will be subject to all of the conditions of registration as set out in these Regulations, as though it were previously unregistered genetically modified propagation material or a genetically modified organism.

Prohibition to sell except as stipulated in the Certificate of Registration

14. The holder of a Registration Certificate will not sell genetically modified propagation material or organisms the genetic composition of which is not practically identified to the samples submitted for examination at the time of registration, or which does not fit the details recorded in the Application for Registration that was the basis for their registration.

Limitation or cancellation of a Registration Certificate	**15. (a)** The Director is authorized to limit or to cancel a Registration Certificate or any detail appearing therein in any of the following instances: 1. The Director learned, following consultation with the MCGM, that the sale of the genetically modified propagation material or organism could harm plants, humans or animals, or have unreasonable influence on the environment; 2. The content of the label attached to genetically modified propagation material or organism offered for sale is not identical to that The Director had authorized; 3. The genetic composition of the genetically modified propagation material or the organism offered for sale is not identical to the composition of the material submitted as a sample to The Director for examination with the Application for Registration.
Register	**16.** The Director will maintain a register that contains authorizations under Regulation 7 and Certificates of Registration.
Preservation of laws	**17.** These regulations come in addition to any other laws and do not detract from them.
Effect	**18.** These regulations come into effect thirty days after their publication.

2nd of Nissan, 5765 (April 11, 2005)

Yisrael Katz
Minister of Agriculture
and Rural Development

[i] Sefer Hachukim 5716, p.97, 5725 p.55.

[ii] Sefer Hachukim 5716, p.79; 5730, p. 36

[iii] Sefer Hachukim 5745, p. 60; 5751, p. 130

[iv] Sefer Hachukim 5735, p. 206

[v] Sefer Hachukim 5718, p. 69; 5731, p. 166.

[vi] Sefer Hachukim 5737, p.226; 5754, p. 348.

[vii] Dinei Medinat Yisrael, (new version), 16, p. 337

[viii] Kovets Takanot, 5731-1970, p. 25, 5747, p. 103